

PAC, which describes itself as “the primary super PAC dedicated to electing federal candidates who support the agenda of the Trump- [REDACTED] administration;” and/or [REDACTED] PAC, which had a stated purpose of working to keep [REDACTED] in control of Congress. These events were often lunches, dinners, or roundtable discussions with high-ranking government officials, including President Trump, Vice-President [REDACTED], Secretary of Energy [REDACTED], Senator [REDACTED], then-House Majority Leader [REDACTED] then-Representative [REDACTED] and Representative [REDACTED] among others.

b. It appears that to attend many of these events, Parnas was required to make contributions to one of the aforementioned PACs. Specifically, on or about February 23, 2018, [REDACTED] [REDACTED] who appears to be in charge of fundraising for the PACs, emailed Parnas at the Parnas Yahoo E-mail Address that in order to attend a March 12, 2018 dinner in New York with Vice-President [REDACTED] and Majority Leader [REDACTED], Parnas needed to make a minimum contribution of \$125,000 to [REDACTED] PAC, with \$50,000 of that amount having to be contributed before the event. On or about March 30, 2018, after Parnas attended an exclusive dinner at [REDACTED] resort in Palm Beach, Florida, [REDACTED] sent Parnas at the Parnas Yahoo E-mail Address a contribution form for [REDACTED] PAC.

c. In connection with these events, it appears that Fruman and/or Parnas made or arranged for the transfer of funds to make a contribution to the [REDACTED] PAC. As described below, it appears, from my review of financial records, that the funds came from a third party – [REDACTED] – who wired the funds from overseas. Specifically, I have learned the following:

i. On or about May 11 and May 14, 2018, [REDACTED] and another individual, [REDACTED], an American attorney, wired a total of \$3,000,000 (\$2,500,000 from [REDACTED]

\$500,000 from [REDACTED] into an attorney escrow account. It appears that the majority of the funds used by [REDACTED] came from bank accounts held in Russia and South Korea. On or about May 15, 2018, [REDACTED] entered into a mortgage agreement with [REDACTED], which documented the \$3,000,000 transfer as a loan to [REDACTED] (which is managed by Igor Fruman and his brother) secured by a condominium owned by [REDACTED] in Bal Harbour, Florida.

ii. On or about May 15 and May 16, 2018, substantially all of that money was transferred from the attorney escrow account in multiple transfers, including a \$1,260,329.80 transfer to a [REDACTED] account in the name of [REDACTED], LLC (the "[REDACTED] Account"), on which Parnas is a signer. The account opening documents for the [REDACTED] Account indicate that the account was opened by Parnas in May 2017 as a "real estate company / PIC [personal investment company]" for the purpose of: "send/receive funds to/from countries outside the U.S." Prior to receiving that transfer, the [REDACTED] Account generally had a low balance and minimal account activity. For instance, in January 2018, the [REDACTED] Account had a beginning balance of \$0.84, and in February 2018 it had a beginning balance of \$66.79.

iii. On or about May 17, 2018, Parnas, with the assistance of [REDACTED], made a \$325,000 contribution in the name of GEP to [REDACTED] PAC. According to a contribution form signed by Parnas, the contribution came from GEP, of which he was the CEO and co-founder. No other individuals were listed on the contribution form. The contribution form stated that "[c]ontributions from foreign nationals . . . are prohibited" and required Parnas to affirm that "[t]his contribution is made from the funds of the above-listed donor, will not be reimbursed

by another, and if this contribution is made via credit card, it is being made with a card for which the donor has a legal obligation to pay and will not be made on the card of another.”

iv. On or about May 17, 2018, \$325,000 of the funds originating from [REDACTED] and [REDACTED] were wired from the [REDACTED] Account to an account owned by [REDACTED] PAC. The payment was reported to the FEC by [REDACTED] PAC as a contribution by GEP, despite the fact that the funds came from [REDACTED] and, in fact, never flowed through an account in the name of GEP. The report to the FEC did not indicate that the contribution was made by Parnas or Fruman, and it did not indicate that the funds used to make the contribution were loaned by [REDACTED] to [REDACTED].

d. It appears that GEP was created shortly before its name was used to make the contributions, and that its name was used in order to obscure the true source of the funds. Specifically, I have learned the following:

i. GEP was incorporated in Delaware on or about April 11, 2018, with [REDACTED] as its registered agent. Neither Fruman nor Parnas was originally registered as an agent of GEP, nor were either of them named in any filing in Delaware relating to the LLC. Parnas has made extensive use of various corporate entities in Florida, and it appears for each of those entities, Parnas has registered those companies in his own name and/or is listed as an officer or agent. Accordingly, it appears that the decision to incorporate GEP in Delaware using the [REDACTED] was made in an attempt to obscure the ownership of the LLC.

ii. The address listed on FEC reports for GEP is [REDACTED] Boca Raton, Florida, which according to public records is a single-family residence owned by individuals named [REDACTED] and [REDACTED]. However, from my review of utility records, I have learned that in or around March 2018, Parnas began paying the utility bill for that property.



Accordingly, it appears that Fruman and Parnas utilized an address for GEP in such a way so as to disguise their involvement with GEP. Based on my review of subscriber records provided by Apple, I have learned that the address listed for Subject Account-1 is [REDACTED], Boca Raton, Florida.

iii. On July 25, 2018, [REDACTED] published an article regarding GEP's contribution to [REDACTED] which suggested that GEP is a shell entity without legitimate business. In response, on July 31, 2018, a "spokesperson" for GEP emailed [REDACTED] that "[t]he donation to [REDACTED] PAC was a 100% legal contribution made by American citizens" and that "[t]he amount donated to [REDACTED] PAC represents only a small fraction of the operating costs of GEP." The "spokesperson" also wrote that "[t]he implication that GEP is some sort of shell company, couldn't be further from the truth, as the company is committed to a long-term plan to export American [liquid natural gas] and is in the process of partnering with major industry leaders both domestically and internationally to achieve that end." Despite that statement, it does not appear that GEP is engaged in transactions involving the purchase, sale, or shipping of oil or gas. Specially, I have reviewed U.S. Department of Energy records, and it does not appear that GEP has a permit to engage in shipping of liquid natural gas. Additionally, based on my review of emails sent and received by Parnas and Igor Fruman, I have learned that GEP was set up at or around the time that the foregoing contributions were made, and it does not appear from bank records that GEP is presently involved in the purchase or sale of oil or gas, or engaged in oil or gas transactions.

#### The [REDACTED] Contributions

23. It appears that the contributions made by Parnas and Fruman to the [REDACTED] PAC were funded with money from third-parties, including Andrey Muraviev, a Russian national.

In an apparent effort to obscure the true donor of the funds, Parnas and Fruman moved the funds through multiple accounts, and it appears Fruman made at least one contribution in a variation of his own name.

24. Specifically, based on my review of FEC records, financial records, emails obtained pursuant to the E-Mail Search Warrant, public sources, and my training and experience, I have learned the following:

a. As described above, Parnas and Fruman were invited by [REDACTED] to attend fundraising events sponsored by PACs, including the [REDACTED] PAC. For instance, as noted above, in order to attend a March 12, 2018 dinner in New York with Vice-President [REDACTED] and Majority Leader [REDACTED], Parnas was required to make a minimum contribution of \$125,000 to [REDACTED] PAC, with \$50,000 of that amount having to be contributed before the event.

b. On or about March 19, 2018, Igor Fruman, made a \$50,000 contribution to [REDACTED] PAC. From my review of FEC records, I have learned that this contribution was reported in the name of [REDACTED]. From my review of emails, it appears that the contribution was made to satisfy the \$50,000 contribution requirement to attend the March 12, 2018 dinner in New York.

c. It appears, from my review of financial records, that some of the funds used to make the [REDACTED] PAC contributions also came from the funds wired by [REDACTED] discussed above. In particular, on or about May 22, 2018, \$100,000 of the funds that originated from [REDACTED] and were transferred into the [REDACTED] Account – as described above – were wired to a [REDACTED] bank account in the name of GEP.

d. On or about June 29, 2018, Parnas made an \$11,000 contribution to [REDACTED] PAC. Based on my review of the financial records associated with the GEP account, I have

learned that on or about July 2, 2018, \$11,000 of the funds wired into the GEP account – which originated from [REDACTED] – were used to make a contribution to [REDACTED] PAC in Parnas's name.

e. On or about June 12, 2018, Igor Fruman made another \$50,000 contribution to [REDACTED] PAC, which was reported as given by "[REDACTED] with the employer [REDACTED] [REDACTED]."

f. Based on my review of financial records, I have learned the following about the source of funds that was used to make this contribution:

i. On or about September 18, 2018, a bank account held at [REDACTED] [REDACTED] in the name of [REDACTED] to which [REDACTED] is the authorized signatory (the "[REDACTED] Account") received a \$500,000 wire transfer from an account held in the name of [REDACTED] Ltd. at [REDACTED], a Swiss bank. Based on my review of financial records and public sources, I have learned that a similarly-named entity based in Russia is associated with Andrey Muraviev, a Russian national, who appears from my review of emails to be in communication and/or business with Fruman and Parnas.

ii. On or about September 19, 2018, approximately \$494,415 of the funds in the [REDACTED] Account – most if not all of which came from [REDACTED] – were used to pay an [REDACTED] bill for a credit card in the name of [REDACTED]

iii. Based on my review of records from [REDACTED], I have learned that the [REDACTED] credit card account was used to pay for a June 12, 2018 contribution to [REDACTED] PAC in the name of "[REDACTED] referenced above, as well as a \$15,000 contribution to the [REDACTED] Fund, and a \$5,400 contribution to [REDACTED] for Congress, all of which were also made in Fruman's name.



The [REDACTED] Contribution

25. It appears that Fruman also made a contribution to the [REDACTED] PAC using funds from a third party.

26. Based on my review of FEC records, financial records, emails obtained pursuant to the E-Mail Search Warrant, public sources, and my training and experience, I have learned the following:

a. On or about April 17, 2018, a finance director for the [REDACTED] National Committee e-mailed Parnas at the Parnas Yahoo E-mail Address to invite him to attend roundtable event at [REDACTED] with President Trump on April 20, 2018. In order to attend the event, Parnas was required to make a minimum contribution of \$100,000 to the [REDACTED]. The finance director subsequently e-mailed [REDACTED] at the [REDACTED] Google E-mail Address, copying Parnas, and noted that, "I believe Mr. Parnas was going to send his contribution information shortly, so we should be good to go for the event."

b. On or about April 27, 2018, Igor Fruman made a \$100,000 donation to the [REDACTED] PAC in the name "[REDACTED]". The information reported to the FEC also stated that the occupation of "[REDACTED]" was employment with [REDACTED]. Based on my review of public sources, it appears that there is another individual – who did not make the contribution – but who is named [REDACTED] and works for [REDACTED].

c. Based on my review of financial records, I have learned the following about the source of funds that was used to make this contribution:

i. On or about May 16, 2018, and May 17, 2018, one day after receiving the transfer of funds that originated from [REDACTED], \$502,650 of those funds was wired from the [REDACTED] Account to the [REDACTED] Account.

ii. Between May 16, 2018, and May 23, 2018, approximately \$262,041 was transferred from the [REDACTED] Account and used to pay an [REDACTED] bill held in the name of [REDACTED] for which Igor and [REDACTED] were authorized account-holders.

iii. That [REDACTED] bill included an April 27, 2018 contribution in the amount of \$100,000 to the House Majority Trust, which was charged to the credit card assigned to Igor Fruman. Although Fruman was the listed contributor in the [REDACTED] disclosure, none of the individuals who were actually responsible for the funds, including [REDACTED], or the other individual responsible for the transfer of the funds, Parnas, were reported as the contributors in the disclosure.

27. Based on all of the foregoing, it appears that as a result of the contributions to [REDACTED] PAC, [REDACTED] PAC, and [REDACTED] PAC, Parnas, Fruman, and their guests were invited to attend multiple [REDACTED] PAC, [REDACTED] PAC, and [REDACTED] events. For instance, based on email correspondence, it appears that on or about February 21, 2018, Parnas and Igor Fruman attended a private event at the library bar at [REDACTED] on or about March 12, 2018, Parnas attended the aforementioned dinner in New York with Vice-President [REDACTED]; on or about March 29, 2018, Parnas attended a dinner at [REDACTED] on or about April 20, 2018, Parnas attended the aforementioned roundtable at [REDACTED] with President Trump; on or about June 13, 2018, Parnas and an associate of his [REDACTED] attended a dinner with Vice-President [REDACTED] and Majority Leader [REDACTED]; and on or about June 18 and



19, 2018, Parnas, Igor Fruman, their business partner David Correia, and [REDACTED] attended a leadership summit at the Trump International Hotel in Washington, D.C. Based on my review of e-mails obtained pursuant to the E-mail Search Warrant, it appears that in addition to taking pictures with politicians, Parnas and Igor Fruman used these events as an opportunity to raise policy issues and requests with certain officials.

D. Contributions to Representative [REDACTED] and Request for Official Action

28. Based on my review of emails obtained pursuant to the E-mail Search Warrant, it appears that Parnas used his attendance at the April 20, 2018 roundtable at [REDACTED] to meet Congressman [REDACTED] and then Parnas, Fruman, Correia and others used subsequent meetings and contributions to gain access to and build a close relationship with Congressman [REDACTED]. Those contributions were made by Igor Fruman and Parnas in June 2018. It also appears that at the request of Parnas and Igor Fruman, Congressman [REDACTED] wrote to U.S. Secretary of State [REDACTED] in May 2018 to ask that the current U.S. Ambassador to the Ukraine be fired and replaced. Specifically, based on my review of public records, financial records, and my review of emails obtained pursuant to the E-mail Search Warrant, I have learned the following:

a. On April 22, 2018, [REDACTED] emailed Congressman [REDACTED] copying Lev Parnas, to identify herself the “Director of Operations of Global Energy Producers” and thanked Congressman [REDACTED] on Parnas’s behalf for “engaging conversation during the round table meeting,” and requested a meeting between Parnas and Congressman [REDACTED] for that week. It appears that [REDACTED] reference to the “round table meeting” was to the April 20, 2018 roundtable at [REDACTED] featuring President Trump, which Parnas attended as a result of Fruman’s \$100,000 donation to the [REDACTED] PAC.

b. Parnas met with Congressman [REDACTED] in Washington, D.C. on May 9, 2018. Parnas brought [REDACTED], who served as co-chairman of the finance committee of the 58th

Presidential Inaugural Committee, to the meeting. A subsequent meeting between Parnas and Congressman [REDACTED] occurred on June 6, 2018. The next day, on June 7, 2018, [REDACTED] e-mailed a member of Congressman [REDACTED]'s staff to report that she had "just spoke to Lev about how we can help out by using our contacts for Congressman [REDACTED]"

c. On June 11, 2018, [REDACTED] wrote [REDACTED], Congressman [REDACTED] communications director, to report that she had "an initial list of donors" and asked if it could be put "on one CC." Later that day, [REDACTED] e-mailed [REDACTED] from a Gmail address, which she described as her "offsite" address, to ask "how much do they think they will bring in." [REDACTED] replied "\$21k on the one credit card." [REDACTED] replied, "the maximum an individual can donate is \$2,700 and a PAC can give up to \$5,000. I'm unsure if we can do that entire amount on one credit card but I can find out." [REDACTED] wrote back that "it will be 8 people on that card."

d. On June 12, 2018, [REDACTED] asked [REDACTED] for a meeting between Parnas and Congressman [REDACTED] which was scheduled for June 14, 2018. When [REDACTED] asked whether it was about "policy related matters or political," [REDACTED] replied, "Lev said it would be about what you previous[ly] met about. He said you would know, hahaha." [REDACTED] replied "I believe it was a political matter involving Eastern European relations."

e. On June 15, 2018, the day after Parnas's meeting with Congressman [REDACTED] [REDACTED] emailed [REDACTED], attaching a letter, and wrote "I think this is it. Please don't distribute, this is only for your records. Thanks for all of your help!" The letter, dated May 9, 2018 – i.e., the aforementioned day that Congressman [REDACTED] met with Parnas and Fruman – was addressed from Congressman [REDACTED] to Secretary of State [REDACTED]. In the letter, Congressman [REDACTED] wrote to Secretary [REDACTED] to "bring to your attention an interaction that I recently had with individuals regarding the current U.S. Ambassador to Ukraine," [REDACTED]